

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. **06-60317**

18 U.S.C. §371
18 U.S.C. §1028A
18 U.S.C. §1341
18 U.S.C. §1343
18 U.S.C. §1542
18 U.S.C. §2
18 U.S.C. §981
18 U.S.C. §3237(a)

CR - DIMITROULEAS

**MAGISTRATE JUDGE
SELTZER**

UNITED STATES OF AMERICA,

Plaintiff,

v.

YVETTE SCOTT PATTERSON,
aka Yvette Scott,
aka Yvette Marcia Patterson,
aka Yvette Fearon,
DELROY PATTERSON,
CHRISTINE A. BROWN,
MEGAN MCGUIRE,
aka Meagan McGuire Roy,
ROOSEVELT DOZIER,
ISHMAEL GRANT,
MAVIS GRANT,
ADEWUYI MAJARO,
aka Adewui Majaro,
MARK REID,
AUDREY LYNCH, and
FITZGERALD PUDDIE,

Defendants.

Certified to be a true and correct copy of the document on file	
Clarence Maddox, Clerk, U. S. District Court Southern District of Florida	
By <u><i>Clarence Maddox</i></u>	Deputy Clerk
Date <u>11/7/06</u>	

INDICTMENT

The Grand Jury Charges:

COUNT ONE - CONSPIRACY

1. Beginning in or about September 2002 and continuing to the present date, in Broward County in the Southern District of Florida, and elsewhere, the defendants,

YVETTE SCOTT PATTERSON,
aka Yvette Scott,
aka Yvette Marcia Patterson,
aka Yvette Fearon,
DELROY PATTERSON,
CHRISTINE A. BROWN,
MEGAN MCGUIRE,
aka Meagan McGuire Roy,
ROOSEVELT DOZIER,
ISHMAEL GRANT,
MAVIS GRANT,
ADEWUYI MAJARO,
aka Adewui Majaro,
MARK REID,
AUDREY LYNCH, and
FITZGERALD PUDDIE,

and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree to commit offenses against the United States of America, that is:

a. during and in relation to a felony violation of Title 18, United States Code, Chapter 63, to knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, in violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5); and

b. to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice and attempting to do so, to place and cause to be placed, in a post office and authorized depository for mail matter, to be delivered by the U.S. Postal Service, and to deposit and cause to be deposited

certain matters and things, to be sent and delivered by a private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1341; and

c. to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice and attempting to do so, to transmit and cause to be transmitted by means of wire communication in interstate commerce, certain writings, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

GENERAL ALLEGATIONS

At times relevant to this Indictment:

2. The following entities were engaged in the business of mortgage lending: Aegis Mortgage Company LLC, American Business Mortgage Services, Inc., Argent Mortgage Company, Inc., BNC Mortgage, Inc., Encore Credit Corp., First Federated Funding Corp., Freemont Investment & Loan, Inc., Household Mortgage Services, Inc., Mortgage Lenders Network USA, Inc., Oak Street Mortgage, Inc., and WMC Mortgage Corp.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was as follows:

3. The defendants sought to unlawfully enrich themselves by defrauding mortgage lenders by fraudulently inducing them to fund mortgages on properties located in Broward County, Florida, and elsewhere, by fraudulently obtaining ownership and control of these properties.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants sought to accomplish the object of the conspiracy included the following:

4. On September 18, 2002, the defendant YVETTE SCOTT PATTERSON incorporated Khadmilroy, Inc., in the state of Florida.

5. On October 23, 2003, Khadmilroy, Inc., was licensed as a mortgage brokerage business by the State of Florida, Office of Financial Regulation. The application of Khadmilroy, Inc., showed the defendant YVETTE SCOTT PATTERSON as president.

6. The offices of Khadmilroy, Inc., were located at various times at 13796 NW 22nd Place, Sunrise, Florida; 1868 N. University Drive, Suite 201, Plantation, Florida; and 6299 West Sunrise Blvd., Sunrise, Florida.

7. During the period December 2002 through July 2003, the defendant YVETTE SCOTT PATTERSON was an employee of Wright Touch Financial Services, Inc., located at 8333 West McNab Road, Tamarac, Florida, handling and processing mortgage applications on behalf of prospective borrowers.

8. The defendant YVETTE SCOTT PATTERSON obtained a State of Florida Notary Public Commission on February 21, 2001, under the name of Yvette M. Scott, birth date 01/09/66, Certificate Number DD 3037, expiration date 2/20/05.

9. The defendant DELROY PATTERSON was the husband of the defendant YVETTE SCOTT PATTERSON and participated in mortgage-related activities at Khadmilroy's office.

10. The defendants YVETTE SCOTT PATTERSON, DELROY PATTERSON, ISHMAEL GRANT, MAVIS GRANT, MARK REID, CHRISTINE A. BROWN, ADEWUYI

MAJARO and AUDREY LYNCH fraudulently and without authorization used and caused to be used the real identities of individuals to buy and sell properties in Broward County, Florida.

11. The defendants ISHMAEL GRANT and MAVIS GRANT fraudulently bought and sold property in Broward County, Florida, with the assistance of defendant YVETTE SCOTT PATTERSON and her company Khadmilroy, Inc., as the mortgage broker on fraudulent mortgage applications.

12. The defendant CHRISTINE A. BROWN at times was an employee of Khadmilroy, Inc., and also assumed the identity of real persons without their knowledge and authority and used the identities of G.A., J.H.B., and J.N., to attend real estate closings and fraudulently act as the purchaser and purchase properties in these persons' names.

13. The defendant MARK REID at times was an employee of Khadmilroy, Inc., and assumed the identity of a real person, J.C., without his knowledge and authority and used the identity of J.C. to attend real estate closings and fraudulently act as the purchaser of properties in this person's name.

14. K.H. was a straw buyer who purchased property in Broward County, Florida, at the direction of defendant YVETTE SCOTT PATTERSON and was promised up to \$5,000.00 for each property on which he was a straw buyer by defendant YVETTE SCOTT PATTERSON.

15. The defendant ISHMAEL GRANT fraudulently induced D.F. and J.M. and others to buy properties in Broward County, Florida.

16. Various title companies acted as the closing agent and closed the real estate transactions on behalf of lenders and prepared settlement and closing documents including HUD-1 Forms.

17. The defendant MEGAN MCGUIRE was a buyer and seller of real estate in Broward County, Florida.

18. The defendant AUDREY LYNCH fraudulently assumed the identity of a real person, F.M., without her knowledge and authority and used the identity of F.M. to attend real estate closings and fraudulently act as the purchaser and purchase property in this person's name.

19. R.W. was an employee of Khadmilroy, Inc., for a few months in 2003. At the direction of defendant YVETTE SCOTT PATTERSON, R.W. assumed the identity of a real person V.W. without her knowledge and authority and used the identity of V.W. to attend a real estate closing and fraudulently act as the purchaser and purchase a property in this person's name.

20. The defendant YVETTE SCOTT PATTERSON, after obtaining a mortgage brokers business license from the state of Florida in the name of Khadmilroy, Inc., acted as a mortgage broker and fraudulently caused others to act as mortgage brokers for her company Khadmilroy, Inc., and solicited and offered to obtain mortgage loans on behalf of borrowers.

21. As part of the mortgage lending process, the defendant YVETTE SCOTT PATTERSON submitted and caused to be submitted fraudulent Uniform Residential Loan Applications and Schedules of Real Estate Owned (Form 1003), Requests for Verification of Employment (Form 1005), Requests for Verification of Deposit (Form 1006), IRS Form W-2's, payroll stubs and any other information as required by the lenders, to be furnished in the borrowers' names, through the mortgage broker to the lender for review and credit worthiness approval.

22. Once the loan was approved by the lender, a closing on the property was scheduled. At the closing, a closing agent, usually a title company acting for the lender, was required to prepare a Settlement Statement (Form HUD 1) showing the funds paid by the borrower and due to the seller.

Also reflected were the closing costs, prorations, escrow deposits, mortgage amounts and obligations to be satisfied. The closing agent would collect funds due from the borrower and disburse funds due to the seller. After the borrower and seller signed the appropriate legal documents, including the warranty deed, note, mortgage and lender disclosure documents, the closing agent would issue a final title policy to the borrower and lender showing the new owner, legal description, mortgage amount and exceptions to the policy. Upon completion of the closing, the closing agent would forward the signed documents as required by the lender from the closing to the lenders office and file the deed and mortgage in the land records of Broward County, Florida.

23. The defendant YVETTE SCOTT PATTERSON was the leader of this scheme and artifice to defraud. Acting as a mortgage broker, the defendant YVETTE SCOTT PATTERSON and her company Khadmilroy, Inc., knowingly sent fraudulent mortgage applications in the identities and names of real people without their knowledge and authorization and in the names of straw buyers to mortgage lenders, which the mortgage lenders relied on in the mortgage approval process in reviewing and approving the loans.

24. The defendant YVETTE SCOTT PATTERSON used straw buyers on fraudulent applications sent to lenders using their identities to stand in as borrowers/purchasers, when in fact they had no interest or intent to be the true borrower/owner or to occupy the property.

25. Under false and fraudulent pretenses, the defendant YVETTE SCOTT PATTERSON would knowingly submit and cause to be submitted these false and fraudulent applications to Aegis Mortgage Company, LLC, American Business Mortgage Services, Inc., Argent Mortgage Company, Inc., Freemont Investment and Loan, First Federated Funding Corp., Mortgage Lenders Network USA, Inc., Oak Street Mortgage, Inc., and WMC Mortgage Corp., in order to fraudulently procure

mortgage financing for the borrowers. The mortgage lenders just prior to the closing would fund these loans by sending their funds by either check or wire transfers to the bank accounts of the closing agent.

26. Under false and fraudulent pretenses, the defendant YVETTE SCOTT PATTERSON and her company, Khadmilroy, Inc., would be paid loan closing fees, mortgage brokerage fees and yield premiums from the various lenders in connection with the fraudulently procured loans.

27. Under false and fraudulent pretenses, the defendants YVETTE SCOTT PATTERSON, ISHMAEL GRANT, and MAVIS GRANT, owned and controlled property in Broward County, Florida, and made substantial profits in connection with the fraudulently obtained mortgage loans.

28. The defendant YVETTE SCOTT PATTERSON, while working at Wright Touch Financial Services, Inc., also created and placed fraudulent mortgage applications with various lenders.

29. The defendant YVETTE SCOTT PATTERSON promised straw buyers they would be paid between \$3,000 and \$5,000 per property for attending the real estate closing and sign the closing documents.

30. On some loans, the defendant YVETTE SCOTT PATTERSON created and caused to be created false bank account statements in the names of the buyers, making the accounts falsely reflect high balances to the lenders.

31. On some loans, the defendant YVETTE SCOTT PATTERSON created and caused to be made false Verification of Employment forms and salary statements in the names of the buyers, making the borrowers appear to be actively employed to the lenders.

32. The defendant YVETTE SCOTT PATTERSON also caused to be created false and fraudulent IRS W-2 forms, wage stubs, letters of explanation, and down payments to the mortgage lenders.

33. The defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT would purchase or cause to be purchased in the names of the buyers, or direct the buyers to purchase, cashier checks or official bank checks from banks, to be used as closing proceeds in order to create the false appearance that these checks were coming from the buyers and not from accounts or funds controlled by the defendant YVETTE SCOTT PATTERSON or ISHMAEL GRANT.

34. The defendant YVETTE SCOTT PATTERSON caused to be made or obtained fraudulent identification documents to be used by the buyers during the mortgage application process and real estate closings. The identification documents used the real identities of other persons without their knowledge and authority included false State of Florida driver's licenses, State of Florida identification cards, and Social Security numbers.

35. The defendants ISHMAEL GRANT and MAVIS GRANT caused false mortgage applications in names of individuals to be sent to mortgage lenders. These mortgage applications were approved for funding by the lenders and then a closing took place. Following the closing, the defendants ISHMAEL GRANT and MAVIS GRANT caused quitclaim deeds to be filed in Broward County, Florida, conveying the property to the defendants ISHMAEL GRANT and or MAVIS GRANT. The defendant ISHMAEL GRANT would then place tenants in these houses and collect rent from the tenants.

36. The defendant FITZGERALD PUDDIE was an employee of Westmoreland Investment Realty, Inc., in Fort Lauderdale, Florida, and solicited a straw buyer of real estate for defendant ISHMAEL GRANT.

37. The defendant FITZGERALD PUDDIE was an employee of Westmoreland Investment Realty, Inc., in Fort Lauderdale, Florida.

38. The defendant YVETTE SCOTT PATTERSON put together and caused the fraudulent mortgage loan application files for the defendants ADEWUYI MAJARO, ISHMAEL GRANT, MAVIS GRANT, AUDREY LYNCH, and MEGAN MCGUIRE to be submitted for approval to the lenders. The defendants sent loan files and other documents to the various lenders using the U.S. Postal Service and private or commercial interstate carriers.

39. The defendant YVETTE SCOTT PATTERSON caused the name of R.W. and the forged signature of R.W. as a Khadmilroy, Inc., employee to be put on the Uniform Residential Loan Application- Form 1003's of borrowers.

40. More than 30 of the loans submitted and caused to be submitted to mortgage lenders by the defendant YVETTE SCOTT PATTERSON were false and fraudulent in some material fashion.

41. The defendant YVETTE SCOTT PATTERSON caused mortgage lenders to pay over \$300,000.00 in loan closing fees, mortgage brokerage fees and yield premiums in connection with these fraudulently procured loans.

42. The aggregate dollar amount of all loans procured fraudulently by the defendants YVETTE SCOTT PATTERSON, DELROY PATTERSON, MEGAN MCGUIRE, ISHMAEL

GRANT, MAVIS GRANT, ADEWUYI MAJARO, and MARK REID, from the mortgage lenders exceeded \$ 10,000,000.00.

OVERT ACTS

In furtherance of the conspiracy and to effect the object thereof, at least one of the following overt acts, among others, was committed by at least one of the conspirators in the Southern District of Florida and elsewhere:

43. 9731 NW 25th Court, SUNRISE, FLORIDA

A. On or about November 22, 2002, the defendants YVETTE SCOTT PATTERSON and DELROY PATTERSON caused a contract for sale to be fraudulently signed using the identity of O.H. as purchaser, on the property known as 9731 NW 25th Court, Sunrise, Florida, in the amount of \$170,000.00.

B. On or about November 22, 2002, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of O.H. as the borrower.

C. On or about January 16, 2003, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 forms in the name of O.H. as the borrower.

D. On or about January 16, 2003, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment form in the name of O.H. as the borrower.

E. On or about January 22, 2003, the defendant YVETTE SCOTT PATTERSON caused the Aegis Funding Corporation to wire transfer \$169,382.07 to the bank account of Statewide Title Corporation at the Wachovia Bank, in Hollywood, Florida.

F. On or about January 22, 2003, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Statewide Title Corporation in Sunrise, Florida.

G. On or about January 22, 2003, the defendant YVETTE SCOTT PATTERSON caused a fraudulent State of Florida identification card in the name of O.H. to be presented at said real estate closing, as proof of identity.

H. On or about January 22, 2003, the defendant YVETTE SCOTT PATTERSON caused a warranty deed to be executed conveying said property known as 9731 NW 25th Court, Sunrise, Florida, to O.H.

I. On November 10, 2003, the defendant YVETTE SCOTT PATTERSON caused a contract for sale to be signed using the name and identity of O. H. to sell said property known as 9731 NW 25th Court, Sunrise, Florida, to K.H., in the amount of \$190,000.00.

J. On or about November 14, 2003, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of K.H. as the borrower.

K. On or about November 14, 2003, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment (Form 1005) in the name of K.H. as the borrower.

L. On or about December 23, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of K.H. as the borrower.

M. On or about January 28, 2004, the defendant YVETTE SCOTT PATTERSON caused a real estate closing on said property to take place at Preferred Land Title of Coral Springs, Florida.

N. On or about January 28, 2004, the defendant, YVETTE SCOTT PATTERSON caused a warranty deed to be issued conveying 9731 NW 25th Court, Sunrise, Florida, from O.H. to K.H.

O. On or about February 6, 2004, the defendant YVETTE SCOTT PATTERSON caused a warranty deed on said property located at 9731 NW 25th Court, Sunrise, Florida to be filed in the land records of Broward County, Florida.

P. On or about November 17, 2004, the defendant YVETTE SCOTT PATTERSON caused K.H. and a person using the identity of F.M. to sign a fraudulent contract for the sale on said property known as 9731 NW 25th Court, Sunrise, Florida, in the amount of \$239,000.00.

Q. On or about November 16, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of F.M. as the borrower.

R. On or about December 6, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 forms in the name of F.M. as the borrower.

S. On or about December 6, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of F.M. as the borrower.

T. On or about December 16, 2004, the defendant YVETTE SCOTT PATTERSON caused a real estate closing on said property to take place at Integrity Title Group, Inc., in Tamarac, Florida.

U. On or about December 16, 2004, the defendant AUDREY LYNCH used a fraudulent State of Florida driver's license in the name of F.M. at a closing for the purpose of proving her identity as the buyer.

V. On or about December 16, 2004, the defendant YVETTE SCOTT PATTERSON caused a warranty deed to be issued conveying 9731 NW 25th Court, Sunrise, Florida, from K.H. to F.M.

W. On or about December 17, 2004, the defendant YVETTE SCOTT PATTERSON caused Integrity Title Group, Inc., to mail closing documents to WMC Mortgage Corp., 15305 N. Dallas Parkway, Ste. 500, Addison, Texas 75001, via Airborne Express Airbill Number 6502101410.

X. On or about December 22, 2004, the defendant YVETTE SCOTT PATTERSON caused a warranty deed in the name of F.M. on property located at 9731 NW 25th Court, Sunrise, Florida, to be filed in the land records of Broward County, Florida.

44. 11160 NW 28TH STREET, SUNRISE, FLORIDA

A. On November 18, 2003, K.H., at the direction of the defendant YVETTE SCOTT PATTERSON, acted as a straw buyer and entered into a contract for sale to buy the property known as 11160 NW 28th Street, Sunrise, Florida, in the amount of \$ 170,000.00.

B. On or about November 12, 2003, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of K.H. as the borrower.

C. On or about November 12, 2003, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment in the name of K.H. as the borrower.

D. On or about February 9, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 forms in the name of K.H. as the borrower.

E. On or about February 25, 2004, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Preferred Land Title in Coral Springs, Florida.

F. On or about February 25, 2004, the defendant YVETTE SCOTT PATTERSON caused K.H. as the straw buyer to bring cash funds of \$15,258.38 to the closing.

G. On or about February 29, 2004, the defendant YVETTE SCOTT PATTERSON caused Preferred Land Title to send the completed closing documents to the lender Argent Mortgage in Hawthorne, New York, via UPS tracking number 1Z6494500198486383.

H. On or about February 25, 2004, the defendant YVETTE SCOTT PATTERSON caused Preferred Land Title to issue a warranty deed to K.H. on said property located at 11160 NW 28th Street, Sunrise, Florida.

I. On or about March 8, 2004, the defendant YVETTE SCOTT PATTERSON caused a warranty deed in the name of K.H., on said property located at 11160 NW 28th Street, Sunrise, Florida, to be filed in the land records of Broward County, Florida.

45. 1400 SW 63rd TERRACE PLANTATION, FLORIDA

A. On or about February 25, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a fraudulent contract to be signed reflecting A.H. was purchasing the property known as 1400 SW 63rd Terrace, Plantation, Florida, for \$310,000.

B. On or about February 25, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a false Uniform Residential Loan Application (Form 1003) in the name of A.H. to be sent to First Federated Funding Corporation of South Florida for a first and second mortgage.

C. On or about February 25, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused to be prepared false wage stubs and W-2 forms in the name of A.H. for the years 2002 and 2003 to be submitted to First Federated Funding Corporation of South Florida.

D. On or about February 25, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a false Borrowers Certification Form to be signed in the name of A.H.

E. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a false Form 1003 to be signed at the real estate closing on said property located at 1400 SW 63rd Terrace, Plantation, Florida.

F. On or about April 16, 2004, the defendant YVETTE SCOTT PATTERSON caused the defendant ROOSEVELT DOZIER to buy a bank check in the amount of \$1,503.02 and be used at the closing as funds brought by the purchaser A.H.

G. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a real estate closing to take place for 1400 SW 63rd Terrace, Plantation, Florida.

H. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused Kahdmilroy, Inc., to be paid a mortgage broker's fee of \$2,815.00 and \$5,745.00 at said closing.

I. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a false Occupancy Form to be signed at closing in the name of A.H.

J. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a false Affidavit of Signature Form to be signed at the closing in the name of A.H.

K. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON caused a closing check in the amount of \$15,700 to be issued to PJ Quality Homes, noted as debt payoff.

L. On or about April 16, 2004, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a warranty deed to be issued in the name of A.H. for said property located at 1400 SW 63rd Terrace, Plantation, Florida.

M. On or about April 23, 2004, the defendant MEGAN MCGUIRE caused a quitclaim deed to be executed conveying 1400 SW 63rd Terrace, Plantation, Florida, from A.H. to the defendant MEGAN MCGUIRE.

N. On or about December 29, 2004, the defendant MEGAN MCGUIRE caused the quitclaim deed executed on April 24, 2004, to be filed in the land records of Broward County, Florida.

O. On or about April 27, 2005, the defendant MEGAN MCGUIRE caused a forged and false Voluntary Petition under Chapter 13 in the name of A.H. to be filed in the Clerk's Office of the United States Bankruptcy Court in Fort Lauderdale, Florida.

P. On or about May 5, 2005, the defendant MEGAN MCGUIRE caused a contract to be executed selling said property located at 1400 SW 63rd Terrace, Plantation, Florida, to J.H.B. for \$400,000.00.

Q. On or about May 10, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a false Uniform Residential Loan Application (Form 1003) in the name of J.H.B. to be sent to WMC Mortgage Corporation.

R. On or about June 24, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a real estate closing to take place at Complete Title Solutions, Inc., on said property located at 1400 SW 63rd Terrace, Plantation, Florida.

S. On or about June 24, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused WMC Mortgage Corporation to wire transfer funds in the amount of \$ 321,037.24 and \$79,225.37 to the bank account of Complete Title Solutions at Wachovia Bank of Florida.

T. On or about June 24, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused numerous documents to be falsely signed in the name of J.H.B. at the closing.

U. On or about June 24, 2005, the defendant YVETTE SCOTT PATTERSON caused the defendant CHRISTINE BROWN to use a fraudulent State of Florida drivers license in the name of J.H.B. at the closing as proof of identity.

V. On or about June 24, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused Khadmilroy, Inc., to be paid mortgage broker's fees of \$17,342.00.

W. On or about June 24, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a warranty deed to be issued to J.H.B. for said property located at 1400 SW 63rd Terrace, Plantation, Florida.

X. On or about June 24, 2005, the defendant MEGAN MCGUIRE received proceeds of the sale in the amount of \$40,146.19.

Y. On or about August 5, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a warranty deed in the name of Julie Hopspedales Brown on said property located at 1400 SW 63rd Terrace Plantation, Florida, to be filed in the land records of Broward County, Florida.

46. 4836 NW 67th AVENUE, LAUDERHILL, FLORIDA

A. On or about August 12, 2004, the defendants ISHMAEL GRANT, MAVIS GRANT and FITZGERALD PUDDIE caused a contract to be signed for the sale of the property known as 4836 NW 67th Avenue, Lauderhill, Florida, to J.M. in the amount of \$550,000.00.

B. On or about September 28, 2004, the defendant ISHMAEL GRANT caused a false Uniform Residential Loan Application (Form 1003) in the name of J.M. to be prepared and signed.

C. On or about September 28, 2004, the defendant ISHMAEL GRANT caused a false Verification of Employment in the name of J.M. as the borrower to be prepared.

D. On or about September 28, 2004, the defendant ISHMAEL GRANT caused a false Verification of Deposit (Form 1006) in the name of J.M. as the borrower to be prepared.

E. On or about October 1, 2004, the defendant ISHMAEL GRANT caused a fraudulent mortgage application of J.M. to be submitted to the lender Encore Credit Corporation.

F. On or about October 6, 2004, the defendant ISHMAEL GRANT caused Encore Credit Corporation to wire transfer \$455,945.50 to the bank account of Consolidated Title Company at the Union Bank in Florida.

G. On or about October 6, 2004, the defendants ISHMAEL GRANT and MAVIS GRANT caused a real estate closing to take place at Consolidated Title Company in Plantation, Florida.

H. On or about October 6, 2004, the defendants ISHMAEL GRANT, MAVIS GRANT and FITZGERALD PUDDIE caused J.M. to sign a false Occupancy Affidavit at the closing.

I. On or about October 7, 2004, the defendant FITZGERALD PUDDIE caused Consolidated Title Company, Inc., in Plantation, Florida, to issue their escrow check number 13546 payable to FITZGERALD PUDDIE, in the amount of \$14,050.00.

J. On or about October 8, 2004, the defendant ISHMAEL GRANT caused Consolidated Title Company, Inc., to send the completed closing documents to the lender Encore Credit Corporation, via Federal Express Airbill # 7902-9971-1222.

K. On or about October 19, 2004, the defendant YVETTE SCOTT PATTERSON notarized a quitclaim deed signed by J.M.

L. On or about November 1, 2004, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused a quitclaim deed to be executed by Juliette Murdock conveying 4836 NW 67th Avenue, Lauderhill, Florida, to the defendants ISHMAEL GRANT and MAVIS GRANT.

M. On or about April 4, 2005, the defendants ISHMAEL GRANT and MAVIS GRANT caused a quitclaim deed dated November 1, 2004, to be recorded in the land records of Broward County, Florida.

47. 2314 NW 13th STREET, FORT LAUDERDALE, FLORIDA

A. On or about September 4, 2004, the defendant YVETTE SCOTT PATTERSON caused a fraudulent contract to be signed in the name of J.C. on the property known as 2314 NW 13th Street, Fort Lauderdale, Florida, in the amount of \$ 130,000.00.

B. On or about September 8, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of J.C. as the borrower.

C. On or about September 8, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 forms in the name of J.C.

D. On or about October 22, 2004, the defendant YVETTE SCOTT PATTERSON caused Mortgage Lenders Network USA, Inc., to wire transfer \$ 130,000 to the bank account of Integrity Title Group, Inc., at the Union Bank, in Fort Lauderdale, Florida.

E. On or about October 22, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a real estate closing to take place at Integrity Title Group, Inc., in Tamarac, Florida.

F. On or about October 22, 2004, the defendant MARK REID used a fraudulent State of Florida driver's license, number C514-440-55-065-0 in the name of J.C., with a photograph of defendant MARK REID on the driver's license as proof of his identity at the closing.

G. On or about October 22, 2004, the defendant MARK REID fraudulently signed documents at a real estate closing using the name and identity of J.C.

H. On or about October 22, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused Khadmilroy, Inc., to be paid mortgage fees of \$ 4,885.00.

I. On or about October 22, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a warranty deed in the name of J.C. on said property located at 2314 NW 13th Street, Fort Lauderdale, Florida, to be issued at the closing.

J. On or about October 28, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a warranty deed in the name of J.C. on said property located at 2314 NW 13th Court, Fort Lauderdale, Florida, to be filed in the land records of Broward County, Florida.

48. 12621 SW 45 Drive, MIRAMAR, FLORIDA

A. On or about September 23, 2004, the defendant YVETTE SCOTT PATTERSON caused a fraudulent contract for sale in the name of J.C. to be signed on the property known as 12621 SW 45th Drive, Miramar, Florida, in the amount of \$346,750.00.

B. In or about September 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of J.C. as the borrower.

C. On or about November 4, 2004, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Mondesir & Alexis, PA, in Fort Lauderdale, Florida.

D. On or about November 4, 2004, the defendant MARK REID used a fraudulent State of Florida driver's license, number C514-440-55-065-0 in the name of J.C., with a photograph of defendant MARK REID on the driver's license, as proof of his identity at the closing.

E. On or about November 4, 2004, the defendant YVETTE SCOTT PATTERSON caused WMC Mortgage Company to wire transfer \$295,789.80 and \$72,077.50 from its bank account in New York to the Wachovia Bank account of Mondesir & Alexis, PA, in Fort Lauderdale, Florida.

F. On or about November 4, 2004, the defendant MARK REID used the identity of J.C. at a closing and fraudulently signed closing documents in the name of J.C.

G. On or about November 4, 2004, the defendant YVETTE SCOTT PATTERSON caused Khadmilroy, Inc., to be paid mortgage fees of \$12,645.00.

H. On or about November 8, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused Mondesir & Alexis, PA, to send the completed closing documents to the lender WMC Mortgage Company, LLC, in Addison, Texas, via Federal Express Airbill 7927-7231-4231.

I. On or about November 15, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a warranty deed in the name of J.C. on property located at 12621 NW 45th Drive, Miramar, Florida, to be filed in the land records of Broward County, Florida.

49. 840 TENNESSEE AVENUE, FORT LAUDERDALE, FLORIDA

A. On September 28, 2004, the defendant YVETTE SCOTT PATTERSON caused a contract for sale to be signed on the property known as 840 Tennessee Avenue, Fort Lauderdale, Florida, in the amount of \$180,00.00.

B. On or about October 20, 2004, the defendant YVETTE SCOTT PATTERSON caused a Modification of Contract to be signed showing F.M. as the new buyer and the price being \$185,000.

C. On or about November 24, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of F.M. as the borrower.

D. On or about November 24, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment in the name of F.M. as the borrower.

E. On or about November 24, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of F.M. as the borrower.

F. On or about November 24, 2004, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Integrity Title Group, Inc., in Tamarac, Florida.

G. On or about November 24, 2004, the defendant YVETTE SCOTT PATTERSON caused the purported borrower F.M. to bring cash funds of \$13,343.86 to the closing.

H. On or about November 24, 2004, Integrity Title Group, Inc., issued check number 1515 in the amount of \$13,343.86 to defendant DELROY PATTERSON.

I. On or about November 24, 2004, a copy of a fraudulent State of Florida driver's license number M520-006-58-961-0 in the name of F.M. was presented at the closing, notarized by the defendant YVETTE SCOTT PATTERSON.

J. On or about November 24, 2004, the defendant AUDREY LYNCH posed as F.M. at the closing and used a fraudulent State of Florida driver's license # M520-006-58-961-0 in the name of F.M. as proof of her identity.

K. On or about November 24, 2004, the defendant YVETTE SCOTT PATTERSON caused Integrity Title Group, Inc., to send the completed closing documents to the lender Argent Mortgage Company in White Plains, New York, via DHL Express Airbill 18286992043.

L. On or about November 30, 2004, the defendants YVETTE SCOTT PATTERSON, DELROY PATTERSON, and AUDREY LYNCH caused a warranty deed in the name of F.M. on property located at 840 Tennessee Avenue, Fort Lauderdale, Florida, to be filed in the land records of Broward County, Florida.

50. 18260 Pine Nut Court, Leigh Acres, Florida

A. On or about August 30, 2004, the defendant ADEWUYI MAJARO signed a contract and caused a person fraudulently using the identity of F.M. to sign a contract to purchase

a house from KB Home, LLC, in Fort Myers, Florida, on the property known as 18260 Pine Nut Court, Leigh Acres, Florida, in the amount of \$272,065.00.

B. On or about September 5, 2004, the defendant ADEWUYI MAJARO issued check number 115 drawn on his account at the Eastern Financial Credit Union, in Miramar, Florida, in the amount of \$2,500.00 payable to KB Homes LLC.

C. On or about November 30, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused to be prepared a fraudulent Uniform Residential Loan Application (Form 1003) in the names of F.M. and defendant ADEWUYI MAJARO, as the borrowers.

D. On or about November 23, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused to be prepared a fraudulent W-2 Wage and Tax Statement and payroll stubs in the name of F.M.

E. On or about October 19, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment in the name of F.M. as the borrower.

F. On or about December 8, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused a real estate closing to take place in Fort Myers, Florida.

G. On or about December 8, 2004, the defendant ADEWUYI MAJARO purchased an Eastern Financial Credit Union Official Bank check number 259116061 in Broward County, Florida, in the amount of \$15,034.00, payable to First American Title.

H. On or about December 8, 2004, the defendant ADEWUYI MAJARO drove the defendant AUDREY LYNCH from Broward County, Florida, to Lee County, Florida.

I. On or about December 8, 2004, the defendant ADEWUYI MAJARO attended a real estate closing at First American Title Insurance Company in Fort Myers, Florida, and presented Eastern Financial Credit Union Official Bank check number 259116061, in the amount of \$15,034.00, payable to First American Title at the closing.

J. On or about December 8, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused the defendant AUDREY LYNCH to use a fraudulent State of Florida driver's license, number M520-006-58-961-0 in the name of F.M. as proof of identity at the real estate closing.

K. On or about December 8, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused First American Title Insurance Company, Inc., to issue a title policy in the name of defendant ADEWUYI MAJARO and F.M., as husband and wife.

L. On or about December 8, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused First America Title Insurance Company, Inc., to issue a corporate warranty deed in the name of defendant ADEWUYI MAJARO.

M. On or about December 8, 2004, the defendants ADEWUYI MAJARO and YVETTE SCOTT PATTERSON caused Mortgage Lenders Network USA, Inc., to issue a mortgage in the name of defendant ADEWUYI MAJARO and F.M., as husband and wife, in the amount of \$272,065.00.

N. On or about December 8, 2004, the defendant YVETTE SCOTT PATTERSON caused First American Title USA, Inc., to issue a check in the amount of \$ 6,801.62 to Khadmilroy, Inc., for loan origination fees.

O. On or about December 9, 2004, the defendant ADEWUYI MAJARO paid \$2254.00 to CC&D Insurance in Sunrise, Florida.

P. On or about December 30, 2004, the defendants ADEWUYI MAJARO caused CC&D Insurance in Sunrise, Florida, to send via Federal Express Airbill 840768797378, an insurance binder to Citizens Property Insurance Corporation, in Jacksonville, Florida.

51. 4792 NW 66th Avenue, LAUDERHILL, FLORIDA

A. On or about September 28, 2004, a fraudulent contract for sale was signed reflecting that J.C. was purchasing the property known as 4792 NW 66th Avenue, Lauderhill, Florida, for \$450,000.

B. On or about September 29, 2004, the defendant YVETTE SCOTT PATTERSON caused a false Uniform Residential Loan Application (Form 1003) in the name of J.C. to be sent to American Business Mortgage Services, Inc.

C. On or about October 25, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment in the name of J.C. to be submitted to American Business Mortgage Services, Inc.

D. On or about October 11, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of J.C. from Washington Mutual Bank and caused it to be sent to American Business Mortgage Services, Inc.

E. In October 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 wage forms in the name of J.C., which were sent to American Business Mortgage Services, Inc.

F. On or about November 10, 2004, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Integrity Title, Inc., in Tamarac, Florida.

G. On or about November 10, 2004, the defendant YVETTE SCOTT PATTERSON caused the defendant MARK REID, posing as the borrower J.C., to bring cash funds of \$ 2,281.82 to the closing.

H. On or about November 10, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a false Owner's Affidavit and Borrower's Signature Authorization to be signed in the name of J.C. at a real estate closing.

I. On or about November 10, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a false Form 1003 to be signed in the name of J.C. at the real estate closing on said property located at 4792 NW 66th Avenue, Lauderhill, Florida.

J. On or about November 10, 2004, the defendant YVETTE SCOTT PATTERSON caused Khadmilroy, Inc., to be paid mortgage broker fees of \$ 8,185.00.

K. On or about November 10, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a false Occupancy Form to be signed at a closing in the name of J.C.

L. On or about November 10, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a false Affidavit of Signature to be signed at the closing in the name of J.C.

M. On or about November 10, 2004, the defendant MARK REID used a fraudulent State of Florida driver's license, number C514-440-55-065-0, in the name of J.C., with

a photograph of defendant MARK REID on the driver's license, as proof of his identity at the closing.

N. On or about November 10, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a warranty deed to be fraudulently issued in the name of J.C. for said property located at 4792 NW 66th Avenue, Lauderhill, Florida.

O. On or about November 10, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused Integrity Title Group, Inc., to send the completed closing documents to the lender American Business Mortgage Services, Inc. (ABMS Direct), at 3168 Braverton Street, #280, Edgewater, Maryland 21307, via Airborne Express Airbill Number 6502090615.

P. On or about November 29, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a quitclaim deed to be executed conveying said property 4792 NW 66th Avenue, Lauderhill, Florida, from J.C. to defendant MARK REID.

Q. On or about March 29, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused the quitclaim deed executed on November 29, 2004, to be filed in the land records of Broward County, Florida.

R. On or about June 6, 2005, the defendant MARK REID executed a contract selling said property at 4792 NW 66th Avenue, Lauderhill, Florida, to S.H. for \$510,000.00.

S. On or about June 9, 2005, the defendant YVETTE SCOTT PATTERSON caused a fraudulent Uniform Residential Loan Application (Form 1003) in the name of straw buyer S.H. to be submitted to WMC Mortgage Corporation.

T. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a real estate closing to take place at Integrity Title Group, Inc.

U. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused Steven Hester to act as a straw buyer at the closing on 4792 NW 66th Avenue, Lauderdale, Florida.

V. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused WMC Mortgage Corporation to fund a first mortgage in the amount of \$407,000 and a second mortgage in the amount of \$97,166.45 for S.H. at a real estate closing.

W. On or about July 12, 2005, the defendant YVETTE SCOTT PATTERSON caused Khadmilroy, Inc., to be paid mortgage brokerage fees of \$14,737.00.

X. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused the straw buyer S.H. to sign closing documents at the closing.

Y. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused S.H. as the straw buyer to sign a false Form 1003 at the closing.

Z. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a warranty deed to be issued to S.H. for said property at 4792 NW 66th Avenue, Lauderdale, Florida.

AA. On or about July 12, 2005, Integrity Title Group, Inc., issued check number 2203 in the amount of \$7,881.41 to the defendant MARK REID at the closing.

AB. On or about July 13, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused Integrity Title, Inc., to mail closing documents to WMC Mortgage Corp., 15303 N. Dallas Pkwy, #500, Addison, Texas 75001, via DHL Airbill #41265343346.

AC. On or about July 21, 2005, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a warranty deed in the name of Steven Hester on said property located at 4792 NW 66th Avenue, Lauderhill, Florida to be filed in the land records of Broward County, Florida.

52. 7836 Kismet Street, Miramar, Florida

A. On October 2, 2004, the defendant YVETTE SCOTT PATTERSON caused a fraudulent contract for sale in the name of J.C. for the property known as 7836 Kismet Street, Miramar, Florida, to be signed in the amount of \$180,000.00.

B. On or about October 5, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of J.C. as the borrower.

C. On or about November 17, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment in the name of J.C. as the borrower.

D. On or about November 17, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of J.C. as the borrower.

E. On or about November 17, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused a real estate closing to take place at Integrity Title, Inc., in Tamarac, Florida.

F. On or about November 17, 2004, the defendant MARK REID used a fraudulent State of Florida driver's license, number C514-440-55-065-0, in the name of J.C., with

a photograph of defendant MARK REID on the driver's license, as proof of his identity at the closing.

G. On or about November 17, 2004, the defendant MARK REID fraudulently signed documents at a real estate closing using the name and identity of J.C.

H. On or about November 17, 2004, the defendants YVETTE SCOTT PATTERSON and MARK REID caused Integrity Title Company, Inc., to send the completed closing documents to the lender Argent Mortgage Company, LLC, in White Plains, New York, via Airborne Express Airbill 502132014.

I. On or about November 17, 2004, the defendant YVETTE SCOTT PATTERSON caused Khadmilroy, Inc., to be paid mortgage brokerage fees of \$19,535.00.

J. On or about January 22, 2005, the defendant YVETTE SCOTT PATTERSON notarized a quitclaim deed reflecting that J.C. conveyed the property at 7836 Kismet Street, Miramar, Florida to Peter Escoffery.

K. On or about April 6, 2005, the defendant YVETTE SCOTT PATTERSON caused a quitclaim deed on said property located at 7836 Kismet Street, Miramar, Florida, to be filed in the records of Broward County, Florida.

53. 7810 NW 46th Street, LAUDERHILL, FLORIDA

A. On or about December 14, 2004, a contract for sale was fraudulently signed using the identity of a B.W. as purchaser on the property known as 7810 NW 46th Street, Lauderhill, Florida, in the amount of \$325,000.00.

B. On or about December 16, 2004, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of B.W. as the borrower.

C. On or about December 16, 2004, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 forms in the name of B.W.

D. On or about February 2, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused a real estate closing to take place at Integrity Title Group, Inc., in Tamarac, Florida.

E. On or about February 2, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused Mortgage Lenders Network USA, Inc., to wire transfer \$230,174.30 and \$57,685.22 from their Bank One account in Chicago, Illinois, to the bank account of Integrity Title Group, Inc., at the Union Bank, in Fort Lauderdale, Florida.

F. On or about February 2, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused Khadmilroy, Inc., to be paid fees of \$8,065.00 at the closing.

G. On or about February 2, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT, caused a warranty deed to be issued to B.W. on the property located at 7810 NW 46th Street, Lauderhill, Florida.

H. On or about February 11, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused a warranty deed in the name of B.W. for said property located at 7810 NW 46th Street, Lauderhill, Florida, to be filed in the land records of Broward County, Florida.

I. On or about September 22, 2005, the defendants ISHMAEL GRANT and MAVIS GRANT caused a quitclaim deed conveying said property at 7810 NW 46th Street, Lauderhill, Florida, from B.W. to the defendants ISHMAEL GRANT and MAVIS GRANT, to be filed in the land records of Broward County, Florida.

J. On or about December 2, 2005, the defendants YVETTE SCOTT PATTERSON, ISHMAEL GRANT, and CHRISTINE BROWN caused a real estate closing to take place at Alpha 2 Omega Title Group, Inc., in Davie, Florida.

K. On or about December 2, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused the defendant CHRISTINE BROWN to use a fraudulent State of Florida driver's license, in the name of G.A., with a photograph of defendant CHRISTINE BROWN on the driver's license as proof of her identity at the closing.

54. 6825 Broadmoor, North Lauderdale, Florida, FORT LAUDERDALE

A. On or about February 11, 2005, the defendant ISHMAEL GRANT caused D.F. to enter into a contract for sale on the property known as 6825 Broadmoor, North Lauderdale, Florida, in the amount of \$ 244,000.00.

B. On or about February 4, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of D.F. as the borrower.

C. On or about March 24, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused to be prepared a false Verification of Employment in the name of D.F. as the borrower.

D. On or about March 24, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused to be prepared a false Verification of Deposit (Form 1006) in the name of D.F. as the borrower.

E. On or about March 29, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused the Argent Mortgage Company to wire transfer \$235,660.30 to the bank account of Integrity Title Group, Inc., at the Union Bank, in Fort Lauderdale, Florida.

F. On or about March 24, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused a real estate closing to take place at Integrity Title Group, Inc., in Tamarac, Florida.

G. On or about March 24, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused D.F. to sign a false Occupancy Agreement Form at the closing.

H. On or about March 25, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused Khadmilroy, Inc., to be paid fees of \$7,939.00 at the closing.

I. On or about March 25, 2005, the defendants YVETTE SCOTT PATTERSON and ISHMAEL GRANT caused Integrity Title Group, Inc., to send the completed closing documents to the lender Argent Mortgage Company in White Plains, New York, via DHL Express Airbill 23041270744.

J. On or about March 23, 2005, the defendant ISHMAEL GRANT caused a quitclaim deed to be executed conveying 6825 Broadmoor, North Lauderdale, Florida, from D.F. to defendant ISHMAEL GRANT.

K. On or about June 6, 2005, the defendant ISHMAEL GRANT caused a quitclaim deed dated March 23, 2005, conveying said property at 6825 Broadmoor, North Lauderdale, Florida, to him to be filed in the land records of Broward County, Florida.

55. 1903 SW 149 AVENUE MIRAMAR, FLORIDA

A. On or about April 9, 2005, the defendant MEGAN MCGUIRE caused a contract for sale to be fraudulently signed in the name of J.H.B. as buyer, for the property known as 1903 SW 149th Avenue, Miramar, Florida, in the amount of \$ 460,000.00.

B. On or about May 10, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of J.H.B. as the borrower.

C. On or about June 10, 2005, the defendants YVETTE SCOTT PATTERSON, and MEGAN MCGUIRE caused to be prepared a false Verification of Employment in the name of J.H.B. as the borrower.

D. On or about June 10, 2005, the defendants YVETTE SCOTT PATTERSON, and MEGAN MCGUIRE caused to be prepared a false Verification of Deposit (Form 1006), in the name of J.H.B. as the borrower.

E. On or about June 10, 2005, the defendant YVETTE SCOTT PATTERSON caused the Argent Mortgage Company in California to wire transfer \$ 365,399.20 and \$ 89,389.47 to the bank account of Complete Title Solutions, Inc., at Wachovia Bank in Florida.

F. On or about June 10, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused a real estate closing to take place at Complete Title Solutions in Fort Lauderdale, Florida.

G. On or about June 10, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused the defendant CHRISTINE BROWN to use a fraudulent State of Florida drivers license in the name of J.H.B. at the closing as proof of identity.

H. On or about June 10, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE caused the borrower to bring cash funds to the closing of \$ 1,912.55.

I. On or about June 10, 2005, the defendant YVETTE SCOTT PATTERSON caused Khadmilroy, Inc., to be paid mortgage broker fees of \$17,998.00.

J. On or about June 10, 2005, the defendant MEGAN MCGUIRE received a check at the closing in the amount of \$ 15, 306.77.

K. On or about June 10, 2005, the defendants YVETTE SCOT PATTERSON, and MEGAN MCGUIRE, caused a warranty deed to be issued to J.H.B. on the property located at 1903 SW 149th Avenue, Miramar, Florida.

L. On or about July 20, 2005, the defendants YVETTE SCOTT PATTERSON and MEGAN MCGUIRE, caused a warranty deed in the name of J.H.B., on said property located at 1903 SW 149th Avenue, Miramar, Florida, to be filed in the land records of Broward County, Florida.

56. 6608 PEBBLE BEACH BOULEVARD, NORTH LAUDERDALE, FLORIDA

A. On or about May 16, 2005, the defendants ISHMAEL GRANT and MAVIS GRANT caused to be prepared a false Uniform Residential Loan Application (Form 1003), in the name of MAVIS GRANT as the borrower, for the purchase of property known as 6608 Pebble Beach Boulevard, North Lauderdale, Florida.

B. On or about June 16, 2005, the defendant ISHMAEL GRANT caused a false Verification of Employment in the name of MAVIS GRANT as the borrower to be prepared.

C. In or about June 2005, defendant ISHMAEL GRANT furnished false wage stubs and W-2 forms in the name of the defendant MAVIS GRANT to the lender.

E. On or about June 24, 2005, the defendant MAVIS GRANT caused a real estate closing to take place at Countyline Title Group, Inc., in Hollywood, Florida.

F. On or about June 29, 2005, the defendant MAVIS GRANT as the borrower received funds back at the closing in the amount of \$38,125.96.

G. On or about June 28, 2005, the defendant MAVIS GRANT caused Countyline Title Company, Inc., to send the completed closing documents to the lender Freemont Savings and Loan in Tampa, Florida via UPS Next Day Air tracking bill 1ZFSE6210190280495.

57. 11535 NW 51ST PLACE, CORAL SPRINGS, FLORIDA

A. On or about June 14, 2005, the defendant YVETTE SCOTT PATTERSON caused a fraudulent contract in the name of J.N. as buyer for the property known as 11535 NW 51st Place, Coral Springs, Florida, in the amount of \$ 640,000 to be signed.

B. On or about June 15, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of J.N. as the borrower.

C. On or about June 15, 2005, the defendant YVETTE SCOTT PATTERSON caused the forged signature of Khadmilroy, Inc., employee R.W. to be placed on the Form 1003 of J.N.

D. On or about July 11, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 Forms in the name of J.N. as the borrower.

E. On or about July 12, 2005, the defendant YVETTE SCOTT PATTERSON caused the WMC Mortgage Corporation to wire transfer \$ 507,611.40 to the bank account of Integrity Title Group, Inc., at the Union Bank, in Fort Lauderdale, Florida.

F. On or about July 12, 2005, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Integrity Title Group, Inc., in Tamarac, Florida.

G. On or about July 12, 2005, the defendant YVETTE SCOTT PATTERSON purchased seventeen Wachovia Bank money orders totaling \$17,000 by cashing Khadmilroy, Inc., check number 2214 in that amount payable to Wachovia.

H. On or about July 12, 2005, the defendant YVETTE SCOTT PATTERSON gave a fraudulent State of Florida driver's license in the name of J.N. to defendant CHRISTINE BROWN.

I. On or about July 12, 2005, the defendant CHRISTINE BROWN, posing as J.N., used the fraudulent State of Florida Driver's license in the name of J.N. at the closing in Tamarac, Florida.

J. On or about July 12, 2005, the defendant CHRISTINE BROWN, posing as J.N., tendered \$17,000 in Wachovia Bank money orders at the closing as funds due from the borrower.

K. On or about July 12, 2005, the defendant YVETTE SCOTT PATTERSON caused Khadmilroy, Inc., to be paid fees of \$7,939.00 at the closing.

L. On or about July 12, 2005, the defendants YVETTE SCOTT PATTERSON and CHRISTINE BROWN caused Integrity Title Group, Inc., to issue a warranty deed to J.N. on the property located at 11535 NW 51st Place, Coral Springs, Florida.

M. On or about July 26, 2005, the defendants YVETTE SCOTT PATTERSON and CHRISTINE BROWN, caused a warranty deed in the name of J.N. on said property located at 11531 NW 51st Place Coral Springs, Florida to be filed in the land records of Broward County, Florida.

58. 5418 NW 21ST AVENUE, CORAL SPRINGS, FLORIDA

A. On or about July 28, 2005, the defendant YVETTE SCOTT PATTERSON caused a fraudulent contract for sale in the name of V.W. to be signed on the property known as 5418 NW 21st Avenue, Coral Springs, Florida, in the amount of \$ 500,000.00.

B. On or about, August 1, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of V.W. as the borrower.

C. On or about August 30, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared false wage stubs and W-2 forms in the name of V.W. as the borrower.

D. On or about September 2, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of V.W. as the borrower.

E. On or about September 19, 2005, the defendant YVETTE SCOTT PATTERSON caused the WMC Mortgage Company to wire transfer \$97,248.14, to the Alpha2Omega Title Group, Inc., bank account at Bank of America, in Davie, Florida.

F. On or about September 19, 2005, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Alpha2Omega Title in Davie, Florida.

G. On or about September 19, 2005, the defendant YVETTE SCOTT PATTERSON caused the borrower to bring cash funds to the closing of \$ 2,020.61.

H. On or about September 19, 2005, the defendants YVETTE SCOTT PATTERSON and DELROY PATTERSON gave R.W. a fraudulent State of Florida driver's license in the name of V.W.

I. On or about September 19, 2005, the defendant DELROY PATTERSON drove R.W. to a real estate closing in Davie, Florida.

J. On or about September 19, 2005, the defendants YVETTE SCOTT PATTERSON and DELROY PATTERSON caused R.W. to use the fraudulent driver's license in the name of V.W. as proof of identity at the real estate closing.

K On or about September 19, 2005, the defendant YVETTE SCOTT PATTERSON caused Alpha2Omega Title Group, Inc., to issue a warranty deed to V.W. on said property located at 5418 NW 21st Avenue, Coral Springs, Florida.

L. On or about November 1, 2005, the defendant YVETTE SCOTT PATTERSON, caused a warranty deed in the name of V.W. on said property located at 5418 NW 21st Avenue, Coral Springs, Florida, to be filed in the land records of Broward County, Florida.

59. 2131 NW 76TH TERRACE, MARGATE, FLORIDA

A On or before November 30, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Uniform Residential Loan Application (Form 1003) in the name of G.A. as the borrower.

B. On or before November 30, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Employment in the name of GW as the borrower.

C. On or before November 30, 2005, the defendant YVETTE SCOTT PATTERSON caused to be prepared a false Verification of Deposit (Form 1006) in the name of G.A. as the borrower.

D. On or about December 2, 2005, the defendant YVETTE SCOTT PATTERSON caused a real estate closing to take place at Alpha2Omega Title Group, Inc., in Davie, Florida.

E. On or about December 2, 2005, the defendant YVETTE SCOTT PATTERSON provided a fraudulent State of Florida driver's license in the name of G.A. to defendant CHRISTINE BROWN.

F. On or about December 2, 2005, the defendant CHRISTINE BROWN used the identification of G.A. at the closing of said property.

All in violation of Title 18, United States Code, Sections 371 and 3237.

COUNTS 2 THROUGH 12

The allegations set forth in paragraphs 2 through 59 of Count I of this Indictment are incorporated herein by reference as though fully set forth herein.

60. On or about the dates enumerated as to each count below, at Broward County in the Southern District of Florida, and elsewhere, the defendants named in the counts set forth below devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, as set forth in

paragraphs 2 through 59 of this Indictment, and for the purpose of executing and in furtherance of such scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, the defendants enumerated as to each count did knowingly and willfully cause to be sent by private and commercial interstate carrier such matters and things, as more particularly described for each count below:

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF MAILING
2	2/29/2004	YVETTE SCOTT PATTERSON	11160 NW 28 th Street, Sunrise, Florida	Closing file from Preferred Land Title, Coral Springs, Florida, to Argent Mortgage Company LLC, in Hawthorne, New York, via UPS Express Airbill Number 1Z6494500198486383
3	10/8/2004	ISHMAEL GRANT, MAVIS GRANT, FITZGERALD PUDDIE	4836 NW 67 th Avenue, Lauderhill, Florida	Closing file from Consolidated Title Co., Plantation, Florida, to Encore Credit Corporation, in Downers Grove, Illinois via Federal Express Airbill Number 7902-9971-1222
4	11/8/2004	YVETTE SCOTT PATTERSON, MARK REID	12621 SW 45 th Drive, Miramar, Florida	Closing file from Mondesir & Alexis Title Co. to WMC Mortgage Company, LLC, Addison, Texas, via Federal Express Airbill Number 7927-7232-4231
5	11/10/2004	YVETTE SCOTT PATTERSON	4792 NW 66 th Avenue, Sunrise, Florida	Closing file from Integrity Title, Tamarac, Florida, to American Business Mortgage Services, Edgewater, MD, via Airborne Express Airbill Number 6502090615

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF MAILING
6	11/17/2004	YVETTE SCOTT PATTERSON, MARK REID	7836 Kismet Street, Miramar, Florida	Closing file from Integrity Title, Tamarac, Florida, to Argent Mortgage Company, LLC, White Plains, New York, via Airborne Express Number 502132014
7	11/24/2004	YVETTE SCOTT PATTERSON	840 Tennessee Avenue, Fort Lauderdale, Florida	Closing file from Integrity Title, Tamarac, Florida, to Argent Mortgage Company, LLC, in White Plains, New York, via DHL Express Airbill Number 18286992043
8	12/17/2004	YVETTE SCOTT PATTERSON	9731 NW 25 th Court, Sunrise, Florida	Closing file from Integrity Title, Tamarac, Florida, to WMC Mortgage Corp, Addison Texas, via Airborne Express Airbill Number 6502101410
9	12/30/2004	ADEWUYI MAJARO	18260 Pine Court, Leigh Acre, Florida	Insurance Binder from CC&D Insurance, Sunrise, Florida, via Fedex Airbill 840768797378 to Citizens Insurance in Jacksonville, Florida
10	3/25/2005	YVETTE SCOTT PATTERSON, ISHMAEL GRANT	6825 Broadmoor, North Lauderdale, Florida	Closing file from Integrity Title, Tamarac, Florida, to Argent Mortgage Company LLC, White Plains, New York, via DHL Express Airbill Number 23041270744
11	6/28/2005	MAVIS GRANT, ISHMAEL GRANT	6608 Pebble Beach Blvd., North Lauderdale, Florida	Closing file from Countyline Title Company, Inc, Hollywood, Florida, via UPS Next Day Air Number 1ZFSE6210190280495

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF MAILING
12	7/13/2005	YVETTE SCOTT PATTERSON, MARK REID	4792 NW 66 th Avenue, Lauderhill, Florida	Closing file from Integrity Title Inc., Tamarac, Florida, to WMC Mortgage Corp., Addison, Texas, via DHL Airbill Number 41265343346

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNTS 13 THROUGH 20

The allegations set forth in paragraphs 2 through 59 of Count 1 of this Indictment are incorporated herein by reference as though fully set forth herein.

61. On or about the dates set forth below at Broward County, in the Southern District of Florida, and elsewhere, the defendants enumerated as to each count below did knowingly, willfully and with an intent to defraud devise a scheme and artifice to defraud and to obtain money from mortgage lenders by means of false and fraudulent pretenses, representations, and promises, knowing the representations and promises were false when made as more particularly described in paragraphs 2 through 59 of Count 1 of this Indictment.

62. On or about the dates enumerated as to each count below, at Broward County in the Southern District of Florida, and elsewhere, for the purpose of executing and in furtherance of the scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses, representations, and promises, the defendants enumerated as to each count did knowingly and willfully cause to be transmitted in interstate commerce by means of wire communications certain signals and sounds, as more particularly described for each count below:

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF WIRE FRAUD COMMUNICATION
13	1/22/2003	YVETTE SCOTT PATTERSON, DELROY PATTERSON	9731 NW 25 th Court, Sunrise, Florida	Wire transfer of \$169,382.07 from Aegis Funding Corp. account at Swiss Bank Corp. in NY, NY to Statewide Title Corp. bank account at Wachovia Bank, Sunrise, Florida
14	10/6/2004	ISHMAEL GRANT, MAVIS GRANT, FITZGERALD PUDDIE	4836 NW 67 th Avenue, Lauderhill, Florida	Wire transfer of \$455,945.60 from Encore Credit Corp. account at Deutsche Bank Trust, NY, NY, to Consolidated Title Co. bank account at Union Bank, Weston, Florida
15	10/22/2004	YVETTE SCOTT PATTERSON, MARK REID	2314 NW 13 th Street, Fort Lauderdale, Florida	Wire transfer of \$131,040.21 from Mortgage Lender Network USA account at JP Morgan Chase Bank, Chicago, Illinois, to Integrity Title Group, Inc., account at Union Bank of Florida, Coral Springs, Florida
16	11/4/2004	YVETTE SCOTT PATTERSON, MARK REID	12621 SW 45 th Drive, Miramar, Florida	Wire transfer of \$295,789.80 from WMC Mortgage Co. account at Bank of New York, NY, NY, to account of Mondesir & Alexis PA, account at Wachovia Bank, North Miami Beach, Florida
17	2/2/2005	YVETTE SCOTT PATTERSON, ISHMAEL GRANT, MAVIS GRANT	7810 NW 46 th Street, Lauderhill, Florida	Wire transfer of \$230,174.30 from Mortgage Lenders Network USA, Inc., account at Bank One in Chicago, Illinois, to account of Integrity Title Group, Inc., at Union Bank, Coral Springs, Florida

COUNT	DATE	DEFENDANTS	PROPERTY ADDRESS	DESCRIPTION OF WIRE FRAUD COMMUNICATION
18	3/29/2005	YVETTE SCOTT PATTERSON, ISHMAEL GRANT	6825 Broadmoor, North Lauderdale, Florida	Wire transfer of \$235,660.30 from Argent Mortgage account at Deutsche Bank Trust in New York, NY, to account of Integrity Title Group, Inc., at Colonial Bank, Coral Springs, Florida
19	6/10/2005	YVETTE SCOTT PATTERSON	1903 SW 149 th Avenue, Miramar, Florida	Wire transfer of \$359,399.20 from Argent Mortgage account at Deutsche Bank Trust in New York, NY, to Complete Title Solutions, Inc., account at Wachovia Bank, Ft. Lauderdale, Florida
20	6/24/2005	YVETTE SCOTT PATTERSON	1400 SW 63 rd Terrace, Plantation, Florida	Wire transfer of \$320,440.24 from WMC Mortgage Corp. account at Bank of New York, NY, NY to account of Complete Title Solutions, Inc., at Wachovia Bank, Ft. Lauderdale, Florida

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS 21 THROUGH 46

63. On or about the dates listed below, at Broward County, in the Southern District of Florida and elsewhere, the defendants, as listed below, during and in relation to felony violations of Title 18, United States Code, Chapter 63, that is, felony violations of Title 18, United States Code, Sections 1341(mail fraud) and 1343(wire fraud), did knowingly use and caused to be used, without lawful authority, a means of identification of another person, that is, a State of Florida driver's license or, a Social Security number, assigned to another person, as described below:

COUNT	DATE	DEFENDANTS	MEANS OF IDENTIFICATION
21	9/24/2004	YVETTE SCOTT PATTERSON, MARK REID	Social Security number of J.C. on Form 1003 - 4792 NW 66 th Avenue, Lauderhill, Florida.
22	11/10/2004	YVETTE SCOTT PATTERSON, MARK REID	The name of J.C. on State of Florida driver's license used at 4792 NW 66 th Avenue, Lauderhill, Florida, closing.
23	9/8/2004	YVETTE SCOTT PATTERSON, MARK REID	Social Security number of J.C. on Form 1003 - 2314 NW 13 th Street, Fort Lauderdale, Florida.
24	10/22/2004	YVETTE SCOTT PATTERSON, MARK REID	The name of J.C. on State of Florida driver's license- used for 2314 NW 13 th Street, Fort Lauderdale, Florida, closing.
25	9/23/2004	YVETTE SCOTT PATTERSON, MARK REID	Social Security Number of J.C. on Form 1003 - 12621 SW 45 Drive, Miramar, Florida.
26	11/04/2004	YVETTE SCOTT PATTERSON, MARK REID	The name of J.C. on State of Florida driver's license used for 12621 SW 45 Drive, Miramar, Florida, closing.
27	10/5/2004	YVETTE SCOTT PATTERSON, MARK REID	Social Security number of J.C. on Form 1003- 7836 Kismet Street, Miramar, Florida.
28	11/17/2004	YVETTE SCOTT PATTERSON, MARK REID	The name of J.C. on State of Florida driver's license used for 7836 Kismet Street, Miramar, Florida, closing.
29	5/10/ 2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	Social Security number of J.H.B. on Form 1003 - 1903 SW 149 th Avenue, Miramar, Florida.
30	6/10/2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	The name of J.H.B. on State of Florida driver's license used for 1903 SW 149 th Avenue, Miramar, Florida, closing.

COUNT	DATE	DEFENDANTS	MEANS OF IDENTIFICATION
31	5/10/2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	Social Security number of J.H.B. on Form 1003 - 1400 SW 63 rd Terrace, Plantation, Florida.
32	6/24/2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	The name of J.H.B. on State of Florida driver's license used for 1400 SW 63 rd Terrace, Plantation, Florida, closing.
33	6/15/2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	Social Security number of J.N. on Form 1003 - 11535 NW 51 st Place, Coral Springs, Florida.
34	7/12/2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	The name of J.N. on State of Florida driver's license used for 11535 NW 51 st Place, Coral Springs, Florida, closing.
35	11/22/2002	YVETTE SCOTT PATTERSON	Social Security number of O.H. on Form 1003,- 9731 NW 25 th Court, Sunrise, Florida.
36	1/22/2003	YVETTE SCOTT PATTERSON	The name of O.H. on State of Florida driver's license used for 9731 NW 25 th Court, Sunrise, Florida, closing.
37	11/30/2004	YVETTE SCOTT PATTERSON, ADEWUYI MAJARO	Social Security number of F.M. on Form 1003 - 18260 Pinenut Court, Leigh Acres, Florida.
38	11/16/2004	YVETTE SCOTT PATTERSON	Social Security number of F.M. on Form 1003 - 9731 NW 25 th Court, Sunrise, Florida.
39	12/16/2004	YVETTE SCOTT PATTERSON,	The name of F.M. on State of Florida Driver's license used for 9731 NW 25 th Court, Sunrise, Florida, closing.
40	11/30/2005	YVETTE SCOTT PATTERSON, CHRISTINE BROWN	Social Security number of G.A. on Form 1003 - 2131 NW 76 th Terrace, Coral Springs, Florida.

COUNT	DATE	DEFENDANTS	MEANS OF IDENTIFICATION
41	11/24/2004	YVETTE SCOTT PATTERSON	Social Security number of F.M. on Form 1003- 840 Tennessee Avenue, Fort Lauderdale, Florida.
42	11/24/2004	YVETTE SCOTT PATTERSON	The name of F.M. on State of Florida driver's license used for 840 Tennessee Avenue, Fort Lauderdale, Florida, closing.
43	9/2/2005	YVETTE SCOTT PATTERSON, DELROY PATTERSON	Social Security number of Virginia Witt on Form 1003 - 5418 NW 121 st Avenue, Coral Springs, Florida.
44	9/19/2005	YVETTE SCOTT PATTERSON, DELROY PATTERSON	The name of V.W. on State of Florida driver's license used for 5418 NW 121 st Avenue, Coral Springs, Florida, closing.
45	2/25/2004	YVETTE SCOTT PATTERSON	Social Security number of A.H. on Form 1003 - 1400 SW 63 rd Terrace, Plantation, Florida.
46	4/16/2004	YVETTE SCOTT PATTERSON	The name of A.H. on State of Florida driver's license used at 1400 SW 63 rd Terrace, Plantation, Florida.

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

COUNT 47

On or about July 31, 2003, in Miami-Dade County, in the Southern District of Florida,

the defendant,

YVETTE SCOTT PATTERSON,
aka Yvette Scott,
aka Yvette Marcia Patterson,
aka Yvette Fearon,

did knowingly and willfully make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for her own use,

contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that the defendant stated in such application that she was Yvette Marcia Patterson and was born in the City of Baltimore, Maryland, on January 9, 1966, when in truth and in fact, as the defendant then and there well knew, she was not born in the City of Baltimore, Maryland, on January 9, 1966; in violation of Title 18, United States Code, Section 1542.

FORFEITURE COUNT

a. The allegations in Count 1 of this Indictment are realleged and by reference and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 28, United States Code, Section 2461 and Title 18, United States Code, Section 981(a)(1)(c) and the procedures outlined at Title 21, United States Code, Section 853.

b. Upon conviction of any of the offenses, alleged in Counts 1 and 2, 4-8, 10, 12, 13, and 15-20, as to defendant YVETTE SCOTT PATTERSON and Counts 1 and 13, as to defendant DELROY PATTERSON, said defendants shall forfeit to the United States all property, real and personal, constituting proceeds obtained from the aforestated offenses and all property traceable to such property, including but not limited to the following property:

1. the sum of \$ 2,365,000.00 USD
2. Real property as follows:

As to YVETTE SCOTT PATTERSON and DELROY PATTERSON:

All that lot or parcel of land, together with buildings

and easements located at:

A single family residence located at 99 Central Road,
Block R, Volume 977, Folio 320, Sydenham, Spanish
Town, St. Catherine, Jamaica, West Indies.

c. Upon conviction of any of the offenses, alleged in Counts 1, 3, 10, 11, 14, 17, and 18, as to defendant ISHMAEL GRANT and Counts 1, 3, 11, 14, and 17, as to defendant MAVIS GRANT, said defendants shall forfeit to the United States all property, real and personal, constituting proceeds obtained from the aforesaid offenses and all property traceable to such property, including but not limited to the following property:

1. the sum of \$ 1,370,000.00 USD.

d. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

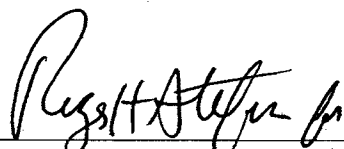
- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All pursuant to Title 28 United States Code, Section 2461, Title 18 United States Code,
Section 981(a)(1)(c) and Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY



JEFFREY H. KAY
ASSISTANT UNITED STATES ATTORNEY